

**MURRAY- NOLAN BERUTTI LLC**  
*Attorneys at Law*

**Partners**

Gwyneth K. Murray- Nolan (NJ, NY, DC)  
[gwyneth@murray-nolanberutti.com](mailto:gwyneth@murray-nolanberutti.com)

Ronald A. Berutti (NJ, NY, KY)  
[ron@murray-nolanberutti.com](mailto:ron@murray-nolanberutti.com)

**Associate**

Rebecca Petersen (NJ)  
[rebecca@murray-nolanberutti.com](mailto:rebecca@murray-nolanberutti.com)

**Of Counsel**

Stephanie Jablonsky (NJ)  
[stephanie@murray-nolanberutti.com](mailto:stephanie@murray-nolanberutti.com)

March 28, 2024

**Via ECF**

Honorable Georgette Castner, U.S.D.J.  
Clarkson S. Fisher Building & U.S. Courthouse  
402 East State Street Room 2020  
Trenton, NJ 08608

**Doe v. Delaware Valley High School Board of Ed. et als.**  
**Civ. No. 3:24-cv-107 (GC)(JBD)**  
**Our File No. 01195**

Dear Judge Castner,

This firm represents the plaintiff, John Doe, in the referenced matter. Please accept this letter as a joint status report.

Last week, the plaintiff filed an Amended Complaint. The request for a preliminary injunction remains and should be unaffected by the Amended Complaint beyond that the allegations have now been revised. The attorneys have been conferring in good faith but request guidance as to discovery and timing issues. More specifically, defense counsel wish to engage in some limited discovery. From the plaintiff's perspective, the Amended Complaint's allegations are verified and it either provides the basis for a preliminary injunction or it does not. However, time is critical since the plaintiff's rights are still being violated, and his daughter remains out of school on medical advice given that the current school position is detrimental to her wellbeing.

Under the circumstances, we respectfully request that Your Honor schedule a conference call to discuss the scheduling of submissions and any hearing on the issue. Please note that I will be out of the country from March 29-April 7<sup>th</sup>.

136 Central Avenue, 2nd Floor, Clark, New Jersey 07066 (908) 588- 2111

30 Wall Street, 8<sup>th</sup> Floor, New York, New York 10005 (Please reply to NJ office)

Honorable Georgette Castner, U.S.D.J.

March 28, 2024

Page 2

We thank Your Honor for the kind consideration of the above

Respectfully yours,

**MURRAY-NOLAN BERUTTI LLC**

*Ronald A. Berutti*

By: \_\_\_\_\_  
Ronald A. Berutti

/RAB